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**Cincinnati Bell  
Telephone®**

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**David L. Meier**  
Director  
Regulatory Affairs

August 14, 1997

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street NW Room 222  
Washington DC 20554

**RECEIVED**

AUG 14 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of: )

MCI TELECOMMUNICATIONS )  
CORPORATION )

RM 9108

Billing and Collection Services Provided )  
By Local Exchange Carriers for Non- )  
Subscribed Interexchange Services )

Dear Mr. Caton,

Enclosed are an original and four copies, plus two additional public copies of the Reply Comments of Cincinnati Bell Telephone Company in the above referenced proceeding. A duplicate original copy of this letter and attached Comments is also provided. Please date stamp this as acknowledgment of its receipt and return it. Questions regarding these Comments may be directed to Patricia Rupich at the above address or by telephone on (513) 397-6671.

Sincerely,

David L. Meier

Enclosure

cc: International Transcription Services, Inc  
Darius B. Withers, (copy and diskette)  
Common Carrier Bureau

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**RECEIVED**

**In the Matter of the Petition of MCI            )  
Telecommunications Corporation                )  
for Rulemaking Regarding Billing                )     **RM 9108**  
and Collection Services Provided by            )  
Local Exchange Carriers for Non-                )  
Subscribed Interexchange Services            )**

**AUG 14 1997**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

**REPLY COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY**

Cincinnati Bell Telephone Company ("CBT") submits these reply comments in response to the initial comments on MCI Telecommunications Corporation's ("MCI") May 19, 1997 Petition for Rulemaking regarding the provisioning of billing and collection services by local exchange carriers ("LECs").

The comments of many of the entities who currently utilize LEC billing and collection services fail to focus on the abuses which have necessitated the imposition of strict performance standards and, in some instances, the discontinuation of billing and collection arrangements. Instead, these entities attempt to characterize the actions of LECs in general as being motivated by a desire to somehow restrict competition.

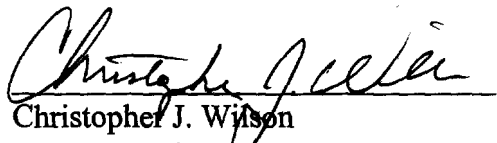
In recent years, CBT has experienced a substantial increase in the number of consumer complaints related to the unscrupulous business practices of certain entities for whom CBT (either directly or indirectly) provides billing and collection services. These business practices primarily include slamming and/or the inclusion of unauthorized, incorrect, or unlawful charges in the information submitted to CBT for billing and collection purposes. When these charges are thereafter included on the bills sent to CBT's local exchange customers, CBT invariably receives calls from the affected

customers who, quite understandably, are confused, frustrated and angry. As a result, CBT often bears the brunt of these consumer complaints (both in time and loss of customer goodwill) even though the entities who are engaging in these unscrupulous business practices have no affiliation whatsoever with CBT.

To the extent other LECs have encountered similar problems, it is not surprising that these LECs have taken steps to curb further abuses of their billing and collection services. CBT submits that all LECs must retain the ability to adopt internal policies to deal with billing and collection abuses as they arise; cease doing business with entities who repeatedly violate their internal policies; and/or exit the billing and collection business entirely if they determine that the negative aspects of operating such a business outweigh the positive aspects.

Respectfully submitted,

FROST & JACOBS LLP


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Dated: August 14, 1997

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of Cincinnati Bell Telephone Company's Reply Comments have been delivered by first class United State Mail, postage prepaid, or by hand delivery on August 14, 1997, to the persons on the list below.

  
Judy Peipmeier

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